

Exhibit 6

Georgia Pacific's Responses to Defendant International
Paper's First Set of Requests for Admission
(January 31, 2012)

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**GEORGIA-PACIFIC CONSUMER
PRODUCTS LP,
FORT JAMES CORPORATION, and
GEORGIA-PACIFIC LLC**

Plaintiffs,

v.

**NCR CORPORATION,
INTERNATIONAL PAPER CO.,
and WEYERHAEUSER CO.,**

Defendants.

No: 1:11-cv-00483

Judge Robert J. Jonker

**GEORGIA-PACIFIC'S RESPONSES TO DEFENDANT INTERNATIONAL PAPER'S
FIRST SET OF REQUESTS FOR ADMISSION**

Plaintiffs, Georgia-Pacific Consumer Products LP, Fort James Corporation, and Georgia-Pacific LLC (collectively "Georgia-Pacific"), by counsel, submit these objections and responses to the First Set of Requests for Admissions from Defendant International Paper Company ("IP").

GENERAL OBJECTION

1. Georgia-Pacific objects to definition of "you", which is apparently a typographical error, as it defines "you" to mean the NCR Corporation. For the purposes of these responses, "you" will be interpreted to mean Plaintiffs.
2. Georgia-Pacific objects generally to list of terms and definitions, the vast majority of which are not used in these Requests.

RESPONSES TO FIRST SET OF REQUESTS FOR ADMISSION

1. Admit that you are presently unaware of any evidence that NCR broke and/or trim was reprocessed at the Bryant Mill specifically during the alleged operation period.

Answer: Denied.

2. Admit that you are presently unaware of any evidence that NCR broke and/or trim was reprocessed at the Bryant Mill specifically during the alleged lease period.

Answer: Denied.

3. Admit that you are presently unaware of any shipments of NCR broke and/or trim that the Bryant Mill received during the alleged operation period.

Answer: Georgia-Pacific objects to the phrase “unaware of any shipments” as being vague and ambiguous. To the extent that this Request asks Georgia-Pacific to admit that there were no shipments of NCR broke and/or trim to the Bryant Mill during the relevant time period, denied. To the extent that it asks Georgia-Pacific to admit that it does not have documentation of specific shipments on specific dates, admitted.

4. Admit that you are presently unaware of any shipments of NCR broke and/or trim to the Bryant Mill received during the alleged lease period.

Answer: Georgia-Pacific objects to the phrase “unaware of any shipments” as being vague and ambiguous. To the extent that this Request asks Georgia-Pacific to admit that there were no shipments of NCR broke and/or trim to the Bryant Mill during the relevant time period, denied. To the extent that it asks Georgia-Pacific to admit that it does not have documentation of specific shipments on specific dates, admitted.

Dated: January 31, 2012

**GEORGIA-PACIFIC CONSUMER PRODUCTS,
LP., FORT JAMES CORPORATION, and
GEORGIA-PACIFIC LLC**

By: /s/ Joseph C. Kearfott

Peter A. Smit, Bar No. P 27886
Varnum LLP
Bridgewater Place, P.O. Box 352
Grand Rapids, MI 49501
(616) 336-6000

Joseph C. Kearfott
Douglas M. Garrou
George P. Sibley, III
Hunton & Williams LLP
951 East Byrd St.
Richmond, VA 23219
(804) 788-8200

Jeffrey N. Martin
Djordje Petkoski
Hunton & Williams LLP
2200 Pennsylvania Avenue, N.W.
Washington, D.C. 20037-1701
(202) 955-1500

Kathy Robb
Hunton & Williams LLP
200 Park Avenue, 52nd Floor
New York, New York 10166-0005
(212) 309-1000

Jan M. Conlin
Tara D. Falsani
Robins, Kaplan, Miller & Ciresi L.L.P.
800 LaSalle Avenue
2800 LaSalle Plaza
Minneapolis, MN 55402
(612) 349-8500

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2012, I caused to be served by electronic mail a copy of Georgia-Pacific's Responses to Defendant International Paper's First Set of Requests for Admission upon counsel for each Defendant, at the following e-mail addresses:

Counsel for NCR Corporation:

Evan R. Chesler	echesler@cravath.com
Geoffrey A. Fields	gfields@dickinsonwright.com
Sandra C. Goldstein	sgoldstein@cravath.com
Eric W. Ha	eha@sidley.com
Linda R Larson	llarson@martenlaw.com
Vanessa A. Lavelly	vlavelly@cravath.com
Meline Grace MacCurdy	mmacurdy@martenlaw.com
Bradley M Marten	bmarten@martenlaw.com
Darin P. McAtee	dmcatee@cravath.com
Omid H. Nasab	onasab@cravath.com
Margaret R. Sobota	msobota@sidley.com
Evan B. Westerfield	evanwesterfield@sidley.com

Counsel for International Paper Co.:

John F. Cermak, Jr.	jcermak@bakerlaw.com
Sonja A. Inglin	singlin@bakerlaw.com
Michael Dominic Meuti	mmeuti@bakerlaw.com
John D. Parker	jparker@bakerlaw.com

Counsel for Weyerhaeuser Co.:

J. Christopher Baird	jcbaire@perkinscoie.com
Douglas A. Dozeman	ddozeman@wnj.com
Michael Dunning	mdunning@perkinscoie.com
Karen M. McGaffey	kmcgaffey@perkinscoie.com
Mark W. Schneider	mwschneider@perkinscoie.com
Scott M. Watson	swatson@wnj.com

By: /s/ Joseph C. Kearfott

Barden, Sheila

From: Alexander, Gayle
Sent: Tuesday, January 31, 2012 1:13 PM
To: Chesler, Evan; Fields, Geoffrey; Goldstein, Sandra; Ha, Eric; Larson, Linda; Lavelly, Vanessa; MacCurdy, Meline; Marten, Bradley; McAtee, Darin; Nasab, Omid; Sobota, Maggie; Westerfield, Evan; Cermak, John; Inglin, Sonja; Meuti, Michael; Parker, John; Baird, Chris; Dozeman, Douglas; Dunning, Michael; McGaffey, Karen; Schneider, Mark; Watson, Scott Michael
Subject: GP et al. v. NCR Corporation et al.: GP Responses to IP's discovery requests
Attachments: img-201020755.pdf; img-201020811.pdf



img-20102075.pdf (703 KB)



img-20102081.pdf (117 KB)